

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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Postal Rate and Fee Changes, 1997

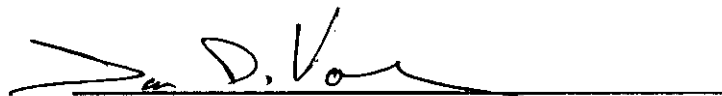
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Docket No. R97-1

**FIRST SET OF INTERROGATORIES OF THE ADVERTISING MAIL
MARKETING ASSOCIATION TO USPS WITNESS TALMO
(AMMA/USPS-LR-H-105-1-4)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the Advertising Mail Marketing Association hereby propounds the attached interrogatories and requests for the production of documents. The instructions contained in our interrogatories to Witness Moeller (AMMA/USPS-T-36-1-3) are incorporated by reference.

If you are unable to provide any of the requested documents or information as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be or have not been provided. If the witness to whom this request is directed cannot respond, but another witness can, please redirect the request to that witness.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins
Counsel to Advertising Mail Marketing
Association

AMMA/USPS-LR-H-105-1

The sample study described in LR-H-105 states that the data were collected for a six (6) week period.

- a. Please confirm that the period began Wednesday, January 23, 1997 and ended Tuesday, March 11, 1997.
- b. If you cannot confirm part a., please provide the correct dates.
- c. How and why was this particular six (6) week period chosen?
- d. Did you or anyone else test the implicit assumption made by the users of these data that the information collected and parameters estimated by the sample study are not subject to seasonal fluctuations?
- e. If the answer to part d is "yes", please provide all analyses of the test(s)?
- f. If the answer to part d is "no", what was the justification for making the assumption described in part d?

AMMA/USPS-LR-H-105-2

What is the data format of each of the machine readable output files in LR-H-105?

AMMA/USPS-LR-H-105-3

USPS Witness Daniel (USPS-T-29 at 3 line 23) references USPS LR-H-105 as the source of the "entry profile" used in mail flow diagrams which in turn become parameters in several cost models.

- a. For each parameter estimated in LR-H-105 and used in USPS-T-29 Appendix I pages 5, 7 or 9 or used in the derivation of any number on these pages, please complete the following table with the exact paired references (cross walk) between the source and use of each parameter:

Source: LR-H-105				Use: USPS-T-29 Appendix I	
Parameter	Location		Standard	Name	Location (and derivation if derived)
<u>Name</u>	<u>(Page, Line, Column, etc.)</u>	<u>Value</u>	<u>Deviation</u>	<u>(if different)</u>	<u>(Page, Line, Column, etc.)</u>
(1)	(2)	(3)	(4)	(5)	(6)

- b. Please confirm that USPS-T-29 makes "proper" use of the estimates that come from LR-H-113? (By "proper" we mean the proper time period(s) and in a manner consistent with the objectives of the sample design and analysis.)
- c. If part b is not confirmed, please explain why you cannot confirm to the uses of these estimates.

AMMA/USPS-LR-H-105-4

The following questions refer to Table 16 (LR-H-105 page 24; hardcopy version).

- a. Please provide the data and the source(s) used to compute the "Percent of Pieces in Trays with at least 150 pieces".
- b. Please provide the 95% confidence interval for the "Percent of Pieces in Trays with at least 150 pieces".
- c. How many total letter trays were observed?
- d. Please confirm that the "Percent of Pieces in Trays with at least 150 pieces" on page 24 is equal to 86.0% (at one significant decimal percentage point) and that this is the source (of 86.03% at two significant decimal percentage points) referred to by Witness Thress USPS-T-7 (at 225 line 24).
- e. If you cannot confirm part d, please show the source of the 86.03% to which Witness Thress referred in the "Standard Mail Characteristics Study".

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: October 30, 1997

A handwritten signature in dark ink, appearing to read 'Ian D. Volner', written over a horizontal line.

Ian D. Volner